

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

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|------------------------------|---|-------------------|
| IN RE: | § | |
| | § | CASE NO. 15-20032 |
| TEXAS ENTERPRISES, LLC d/b/a | § | |
| BLUEBONNET ELITE ASSISTED | § | |
| LIVING | § | |
| | § | CHAPTER 11 |
| DEBTOR. | § | |

APPLICATION TO EMPLOY CHRISTOPHER A. TURNER, PLLC
AS CERTIFIED PUBLIC ACCOUNTANTS FOR THE ESTATE

NO HEARING WILL BE CONDUCTED ON THIS APPLICATION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS APPLICATION SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING UNLESS IT DETERMINES THAT AN EVIDENTIARY HEARING IS NOT REQUIRED AND THAT THE COURT'S DECISION WOULD NOT BE SIGNIFICANTLY AIDED BY ORAL ARGUMENT. IF YOU FAIL TO APPEAR AT ANY SCHEDULED HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

NOW COMES Texas Enterprises, LLC, Chapter 11 Debtor and Debtor-in-Possession (the “Applicant” and/or “Debtor”), and would make this its Application to Employ Christopher A. Turner, PLLC as Certified Public Accountants for the Estate, pursuant to 11 U.S.C. § 327(a), Federal Rule of Bankruptcy Procedure 2014, and Local Rule of Bankruptcy Procedure 2014, and in support thereof respectfully represents as follows:

I.

On March 2, 2015, Debtor commenced this Bankruptcy Case by filing a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.

II.

Applicant requires the services of the accounting firm of Christopher A. Turner, PLLC, as Certified Public Accountants for the estate for the following purposes: (a) preparation of monthly operating reports; (b) preparation of financial statements; (c) perform tax consulting and rendering tax advice; (d) preparation of Income Tax Returns; and (e) any and all other general accounting needs which may arise.

III.

Applicant is informed and believes that Christopher A. Turner, PLLC have extensive experience in the matters upon which they are to be retained, and Applicant feels that said firm is well qualified to render the services required by this estate.

IV.

For the foregoing and all other necessary and proper purposes, Applicant desires to employ Christopher A. Turner, PLLC, 217 North Jefferson Ave., Suite 2, Mt. Pleasant, Texas 75455, Telephone: 903-572-5184, Facsimile: 1-866-927-7208, Email: caturnercpa@catcpatx.com.

V.

Applicant desires to employ Christopher A. Turner, PLLC as Certified Public Accountants for the estate under an hourly basis with such compensation to be paid following application to the Bankruptcy Court. Neither Applicant or Debtor have the expertise which will be required in the referenced action. Anticipated accountant to be involved in this effort is Christopher A. Turner. Hourly rates for the firm of Christopher A. Turner, PLLC are as follows: (a) Christopher A. Turner - \$175.00; (b) Julie Jones - \$50.00; and (c) Donna Jefferson-Baker - \$65.00.

VI.

To the best of Applicant's knowledge and based upon the Declaration attached hereto, Applicant believes that Christopher A. Turner, PLLC, its members and associates, do not hold or represent any interest adverse to that of the Debtor's estate with respect to the matter for which employment is sought.

VII.

Applicant further submits that to the best of his knowledge and belief, such approval does not impair or prejudice any party in interest.

A Rule 2014 Declaration of Christopher A. Turner is attached hereto.

A retainer has not been paid to Christopher A. Turner, PLLC

WHEREFORE PREMISES CONSIDERED, Applicant prays for an Order of this Court approving the employment of Christopher A. Turner, PLLC as Certified Public Accountants for the Estate to render legal services in the areas described above with such compensation as may be awarded by the Court upon proper application submitted pursuant to Fed. R. Bankr. P. 2016 (a) and Local Rule of Bankruptcy Procedure 2016.

SIGNED April 20, 2015.

Respectfully submitted,
SEARCY & SEARCY, P.C.

/s/ Joshua P. Searcy
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ATTORNEYS FOR CHAPTER 11

CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the above and foregoing was served via electronic means, if available; otherwise, served via regular first class mail to each interested party shown below and to each party on the attached service list, on or before April 21, 2015.

/s/ Joshua P. Searcy
Joshua P. Searcy

Christopher A. Turner, PLLC
c/o Christopher A. Turner
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Mt. Pleasant, Texas 75455